

# KAPLAN HECKER & FINK LLP

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 7/20/2021

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**MEMO ENDORSED**

July 20, 2021

BY ECF

Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: USA v. Stefan He Qin, No. 21-cr-00075 (VEC) (S.D.N.Y.)**

Dear Judge Caproni:

I write on behalf of Stefan He Qin, defendant in the above-captioned matter, to respectfully request a 30-day adjournment of Mr. Qin's sentencing, which is currently scheduled to take place on August 19, 2021 at 11:00 a.m. This is Mr. Qin's second request to adjourn his sentencing. The government does not object to this request.

Mr. Qin has been evaluated by a psychiatrist who intends to submit a report in connection with Mr. Qin's pre-sentencing submission. Because of a medical emergency, Mr. Qin's psychiatrist has been delayed in completing his report. In addition, Mr. Qin is continuing to assist the Receiver appointed by the Court in the action brought by Securities and Exchange Commission in its efforts to recover investor funds. *See SEC v. Stefan Qin et al.*, No. 20-cv-10849 (LGS) (S.D.N.Y.). Accordingly, I respectfully request that the Court adjourn the August 19, 2021 sentencing to a date on or about 30 days later. I have conferred with counsel for the government, and one or both of us are unavailable on the following dates: September 7, 15, 16, 21, 22 and 23.

Respectfully submitted,



Sean Hecker

cc: Assistant U.S. Attorney Daniel Tracer

Application GRANTED.

Mr. Qin's sentencing is adjourned to **Wednesday, September 15, 2021 at 2:00 P.M.** The parties pre-sentencing submissions are due no later than **Wednesday, September 1, 2021.**

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

Date: July 20, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE